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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

RESIDENTIAL CAPITAL, LLC, et al.,

Debtors.  
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Case No. 12-12020 (MG)

Chapter 11

Jointly Administered

**SECOND AMENDED<sup>1</sup> PROPOSED AGENDA FOR MATTERS  
SCHEDULED TO BE HEARD ON FEBRUARY 28, 2013 AT 2:30 P.M. (EST)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,  
Alexander Hamilton U.S. Custom House, Courtroom 501, One Bowling Green, New York, NY  
10004-1408

**I. RESOLVED MATTERS**

1. MED&G Group LP's Motion for Relief from the Automatic Stay of 11 U.S.C. § 362  
[Docket No. 2274]

**Related Documents:**

- a. Notice of Adjournment of Hearing on Med&G Group LP's Motion for  
Relief from the Automatic Stay of 11 U.S.C. § 362 to February 7, 2013 at  
10:00 a.m. [Docket No. 2723]

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<sup>1</sup> Amended items appear in **bold**.

- b. Notice of Adjournment of Hearing on MED&G Group LP's Motion for Relief from the Automatic Stay of 11 U.S.C. § 362 to February 28, 2013 at 2:00 p.m. [Docket No. 2831]
- c. **Notice of Adjournment of Hearing on MED&G Group LPs Motion for Relief from the Automatic Stay of 11 U.S.C. § 362 to March 21, 2013 at 10:00 a.m. [Docket No. 3053]**

**Responses:**

- a. Debtors' Objection to Motion for Relief from the Automatic Stay of 11 U.S.C. § 362 by MED&G Group, LP [Docket No. 2680]

**Status: The hearing on this matter has been adjourned to March 21, 2013.**

- 2. Motion of Antoinette Aribal for Clarification of Order Modifying Automatic Stay Provisions of 11 U.S.C. § 362 [Docket No. 2596]

**Related Documents:**

- a. Final Supplemental Order Under Bankruptcy Code Sections 105(a), 362, 363, 502, 1107(a), and 1108 and Bankruptcy Rule 9019 (I) Authorizing the Debtors to Continue Implementing Loss Mitigation Programs; (II) Approving Procedures for Compromise and Settlement of Certain Claims, Litigations and Causes of Action; (III) Granting Limited Stay Relief to Permit Foreclosure and Eviction Proceedings, Borrower Bankruptcy Cases, and Title Disputes to Proceed; and (IV) Authorizing and Directing the Debtors to Pay Securitization Trustee Fees and Expenses [Docket No. 774]
- b. Notice of Hearing on Motion Made by Antoinette Aribal [Docket No. 2610]
- c. Notice of Adjournment of Hearing on Antoinette Aribal's Motion for Clarification of Order Modifying Automatic Stay Provisions of 11 U.S.C. § 362 to February 28, 2013 at 2:00 p.m. [Docket No. 2776]
- d. **Notice of Withdrawal of Motion for Clarification of Order Modifying Automatic Stay Provisions of 11 U.S.C. § 362 [Docket No. 3045]**

**Responses:**

- a. Debtors' Objection to Motion for Clarification of Order Modifying Automatic Stay Provisions of 11 U.S.C. § 362 [Docket No. 2996]

**Status: This matter has been resolved. Movant has filed a notice withdrawing the motion with the Court.**

**II. ADJOURNED MATTERS**

1. Status Conference on the Debtors' Second Supplemental Motion Pursuant to Fed. R. Bankr. P. 9019 for Approval of RMBS Trust Settlement Agreements [Docket No. 1887]

**Related Documents:**

- a. Fourth Revised Joint Omnibus Scheduling Order and Provisions for Other Relief Granting Debtors' Motion Pursuant to Fed. R. Bankr. P. 9019 for Approval of RMBS Trust Settlement Agreements [Docket No. 2528]
- b. Notice of Adjournment of Status Conference on Debtors' Second Supplemental Motion Pursuant to Fed. R. Bankr. P. 9019 for Approval of RMBS Trust Settlement Agreements [Docket No. 3002]

**Status:** The status conference on this matter has been adjourned to March 1, 2013.

2. Motion of Lead Plaintiffs and the Putative Class to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 2044]

**Related Documents:**

- a. Memorandum of Law in Support of Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 2045]
- b. Declaration of R. Fredrick Walters, David M. Skeens and R. Bruce Carlson in Support of Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 2047]
- c. Notice of Adjournment of Hearing on Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims to February 7, 2013 at 10:00 a.m. [Docket No. 2399]
- d. Notice of Adjournment of Hearing on Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims to February 28, 2013 at 2:00 p.m. [Docket No. 2730]
- e. Notice of Adjournment of Hearing on Motion of Lead Plaintiffs and the Putative Class to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 3029]

**Responses:**

- a. Debtors' Opposition to Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 2337]

- b.** Declaration of K. Lee Marshall in Support of Debtors' Opposition to Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 2338]
- c.** Response and Reservation of Rights of PNC Bank, N.A. to Motion of Rowena Drennan, Flora Gaskin, Roger Turner, Christie Turner, John Picard and Rebecca Picard to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 2343]
- d.** Statement and Reservation of Rights of the Official Committee of Unsecured Creditors with Respect to the Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims Filed by Rowena Drennen [Docket No. 2869]

**Replies:**

- a.** Reply to Debtors' Objection to Class Certification Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 2874]
- b.** Supplemental Declaration of R. Bruce Carlson in Support of Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 2875]
- c.** Declaration of David M. Skeens and R. Keith Johnston in Support of Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 2876]
- d.** Declaration of Roy Fredrick Walters in Support of Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 2877]
- e.** Second Supplemental Declaration of R. Bruce Carlson in Support of Motion to Apply Bankruptcy Rule 7023 and to Certify Class Claims [Docket No. 2880]

**Status:** The hearing on this matter has been adjourned to April 11, 2013.

- 3.** Motion of Jacques and Deirdre Raphael for Relief from Stay [Docket No. 2156]

**Related Documents:**

- a.** Notice of Adjournment of Hearing on Motion of Jacques and Deirdre Raphael for Relief from Stay to February 28, 2013 at 2:00 p.m. [Docket No. 2654]
- b.** Notice of Adjournment of Hearing on Motion of Jacques and Deirdre Raphael for Relief from Stay to April 11, 2013 at 10:00 a.m. [Docket No. 3024]

**Responses:** None.

**Status:** The hearing on this matter has been adjourned to April 11, 2013.

4. Motion of Jacques and Deirdre Raphael for Relief from Stay [Docket No. 2463] (requesting the same relief as Docket No. 2156)

**Related Documents:**

- a. Notice of Adjournment of Hearing on Motion of Jacques and Deirdre Raphael for Relief from Stay to February 28, 2013 at 2:00 p.m. [Docket No. 2722]
- b. Notice of Adjournment of Hearing on Motion of Jacques and Deirdre Raphael for Relief from Stay to April 11, 2013 at 10:00 a.m. [Docket No. 2948]

**Responses:** None.

**Status:** The hearing on this matter has been adjourned to April 11, 2013.

5. Motion of Connecticut Housing Finance Authority ("CHFA") for the Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) [Docket No. 2401]

**Related Documents:**

- a. Notice of Motion of Connecticut Housing Finance Authority ("CHFA") for the Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) [Docket No. 2421]
- b. [Proposed] Order Granting Connecticut Housing Finance Authority ("CHFA") Relief from the Automatic Stay, for Cause, Pursuant to 11 U.S.C. §§ 105 & 362(d) [Docket No. 2422]
- c. Notice of Adjournment of Hearing on Motion of Connecticut Housing Finance Authority ("CHFA") for the Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) to January 29, 2013 at 10:00 a.m. [Docket No. 2624]
- d. Notice of Adjournment of Hearing on Motion of Connecticut Housing Finance Authority ("CHFA") for the Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) to February 7, 2013 at 10:00 a.m. [Docket No. 2729]
- e. Notice of Adjournment of Hearing on Motion of Connecticut Housing Finance Authority ("CHFA") for the Entry of an Order Granting Relief

from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) to February 28, 2013 at 2:00 p.m. [Docket No. 2848]

- f. Notice of Adjournment of Hearing on Motion of Connecticut Housing Finance Authority (“CHFA”) for the Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) to March 21, 2013 at 10:00 a.m. [Docket No. 3008]

**Responses:**

- a. Debtors’ Response and Reservation of Rights to Motion of Connecticut Housing Finance Authority (“CHFA”) for the Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) [Docket No. 2623]

**Status:** The hearing on this matter has been adjourned to March 21, 2013.

6. Debtors’ Objection to Proof of Claim Number 3545 Filed by Nicole Bradbury, *et al.* Against GMAC Mortgage, LLC Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007 [Docket No. 2584]

**Related Documents:**

- a. Notice of Adjournment of Hearing on Debtors’ Objection to Proof of Claim Number 3545 Filed by Nicole Bradbury, et al. Against GMAC Mortgage, LLC Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007 to February 28, 2013 at 2:00 p.m. [Docket No. 2731]
- b. Notice of Adjournment of Hearing on Debtors’ Objection to Proof of Claim Number 3545 Filed by Nicole Bradbury, et al. Against GMAC Mortgage, LLC Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007 to March 21, 2013 at 10:00 a.m. [Docket No. 2979]

**Responses:** None.

**Status:** The hearing on this matter has been adjourned to March 21, 2013.

7. Debtors’ Motion for the Entry of an Order Further Extending Their Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof [Docket No. 2918]

**Related Documents:**

- a. Bridge Order Further Extending the Exclusive Period During Which Only the Debtors May File a Chapter 11 Plan [Docket No. 3007]
- b. Notice of Adjournment of Hearing on Debtors’ Motion for the Entry of an Order Further Extending Their Exclusive Periods to File a Chapter 11 Plan

and Solicit Acceptances Thereof to March 5, 2013 at 10:00 a.m. [Docket No. 3023]

**Responses:**

- a. Objection of Ad Hoc Group of Junior Secured Noteholders to Debtors' Motion for the Entry of an Order Further Extending Their Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof [Docket No. 2997]

**Status:** The hearing on this matter has been adjourned to March 5, 2013.

**III. ADJOURNED ADVERSARY PROCEEDING MATTERS**

**Farr v. GMAC Mortgage, LLC (Adv. Proc. No. 12-01899)**

- 1. Pre-trial Conference in Adversary Proceeding

**Related Documents:**

- a. Complaint [Docket No. 1]
- b. Summons with Notice of Pre-Trial Conference [Docket No. 2]
- c. Stipulation and Order Between Michael A. Farr and GMAC Mortgage, LLC [Docket No. 3]
- d. Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(5) and (6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 4]
- e. Notice of Adjournment of Hearing to March 21, 2013 at 10:00 a.m. [Docket No. 8]

**Status:** The pre-trial conference on this matter has been adjourned to March 21, 2013.

- 2. Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(5) and (6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 4]

**Related Documents:**

- a. Notice of Adjournment of Hearing to February 28, 2013 at 2:00 p.m. [Docket No. 6]
- b. Notice of Adjournment of Hearing to March 21, 2013 at 10:00 a.m. [Docket No. 8]

**Responses:** None.

**Status:** The hearing on this matter has been adjourned to March 21, 2013.

**Jenkins v. Residential Funding Co., LLC (Adv. Proc. No. 12-01935)**

**1. Pre-Trial Conference in Adversary Proceeding**

**Related Documents:**

- a.** Complaint [Docket No. 1]
- b.** Summons and Notice of Pre-Trial Conference [Docket No. 5]
- c.** Agreed to Letter to Judge Glenn from Norman S. Rosenbaum Requesting an Extension of Deadline to Respond in Adversary Proceeding [Docket No. 7]
- d.** Memorandum Endorsed, So Ordered, Letter signed on December 14, 2012 Extending the Defendants' Deadline to Answer or Otherwise Respond to the Complaint until January 21, 2013 and Rescheduling the Pre-trial Conference to January 29, 2013 at 10:00 AM. [Docket No. 8]
- e.** Defendant Judy Faber's Motion for Dismissal of Adversary Proceeding Pursuant to Federal Rule of Civil Procedure 12(b)(6) [Docket No. 9]
- f.** Debtors' Motion Pursuant to Fed. R. Bankr. P. 7012 and Fed. R. Civ. P. 12(e) for a More Definite Statement [Docket No. 10] (*also filed in the Residential Capital, LLC Chapter 11 Case [Docket No. 2683]*)
- g.** Debtor's Notice of Litigation Hold Notification, filed by Marion L. Jenkins [Docket No. 13]
- h.** Notice of Continued Pre-Trial Conference Scheduled for February 7, 2013 at 10:00 a.m. [Docket No. 14]
- i.** Notice of Adjournment of Continued Pre-Trial Conference and Hearing on Debtors' Motion Pursuant to Fed. R. Bankr. P. 7012 and Fed. R. Civ. P. 12(e) for a More Definitive Statement to March 5, 2013 at 10:00 a.m. [Docket No. 18]

**Status:** The pre-trial conference on this matter has been adjourned to March 5, 2013.

- 2. Debtors' Motion Pursuant to Fed. R. Bankr. P. 7012 and Fed. R. Civ. P. 12(e) for a More Definite Statement [Docket No. 10] (*also filed in the Residential Capital, LLC Chapter 11 Case [Docket No. 2683]*)**



**Related Documents:**

- a. Notice of Adjournment of Continued Pre-Trial Conference and Hearing on Debtors' Motion Pursuant to Fed. R. Bankr. P. 7012 and Fed. R. Civ. P. 12(e) for a More Definite Statement to March 5, 2013 at 10:00 a.m. [Docket No. 18]

**Responses:** None.

**Status:** The hearing on this matter has been adjourned to March 5, 2013.

**American Residential Equities, LLC v. GMAC Mortgage, LLC (Adv. Proc. No. 12-01934)**

- 1. Pre-trial Conference in Adversary Proceeding

**Related Documents:**

- a. Complaint [Docket No. 1]
- b. Summons with Notice of Pre-Trial Conference [Docket No. 3]
- c. Stipulation and Order Between American Residential Equities, LLC and GMAC Mortgage, LLC [Docket No. 7]
- d. Exhibits A and B to Complaint [Docket No. 9]
- e. Second Summons with Notice of Pre-Trial Conference [Docket No. 11]
- f. Stipulation and Order Between American Residential Equities, LLC and Balboa Insurance Company [Docket No. 17]
- g. Debtors' Motion for Dismissal of Adversary Proceeding [Docket No. 18]

**Status:** The pre-trial conference on this matter has been adjourned by mutual agreement of the parties to April 11, 2013. A stipulation has been submitted to Chambers.

**Wilson v. Residential Capital, LLC (Adv. Proc. No. 12-01936)**

- 1. Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 4]

**Related Documents:**

- a. Amended Notice of Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 5]

- b.** Notice of Adjournment of Hearing on Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 11]

**Responses:** None.

**Status:** The hearing on this matter has been adjourned by mutual agreement of the parties to March 21, 2013.

**IV. CURE OBJECTIONS HEARING:**

- 1. Sale Motion:** Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), and (m), 365 and 1123, and Fed. R. Bankr. P. 2002, 6004, 6006, and 9014 for Orders: (A)(I) Authorizing and Approving Sale Procedures, Including Break-Up Fee and Expense Reimbursement; (II) Scheduling Bid Deadline and Sale Hearing; (III) Approving Form and Manner of Notice Thereof; and (IV) Granting Related Relief and (B)(I) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (II) Authorizing and Approving Asset Purchase Agreements Thereto; (III) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto; and (IV) Granting Related Relief [Docket No. 61]

**Related Documents:**

- a. Sale Procedures Order:** Order Under 11 U.S.C. §§ 105, 363(b) and 365 (I) Authorizing and Approving Sale Procedures, Including Payment of Break-up Fees; (II) Scheduling Bid Deadline, Auction (If Necessary) and Sale Hearing; (III) Establishing Assumption and Assignment Procedures, Including Procedures for Fixing Cure Amounts; and (IV) Establishing Notice Procedures and Approving Forms of Notice [Docket No. 538]

**Cure Notices**

- (i)** Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto [Docket No. 924]
- (ii)** First Supplemental Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto [Docket No. 1459]
- (iii)** First Amended and Restated Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts,

Unexpired Leases of Personal Property, and Unexpired  
Leases of Nonresidential Real Property and (II) Cure  
Amounts Related Thereto [Docket No. 1484]

- (iv) First Notice of (I) Debtors' Intent to Assume and Assign  
Certain SBO Servicing Agreements as Executory Contracts  
and (II) Cure Amounts Related Thereto [Docket No. 2076]
- (v) Second Notice of (I) Debtors' Intent to Assume and Assign  
Certain SBO Servicing Agreements as Executory Contracts  
and (II) Cure Amounts Related Thereto [Docket No. 2077]

- b. **Ocwen Sale Order:** Order Under 11 U.S.C. §§ 105, 363 and 365 and Fed. R. Bankr. P. 2002, 6004, 6006 and 9014 (I) Approving (A) Sale of Debtors' Assets Pursuant to Asset Purchase Agreement with Ocwen Loan Servicing, LLC; (B) Sale of Purchased Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests; (C) Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Thereto; (D) Related Agreements; and (II) Granting Related Relief [Docket No. 2246]
- c. **Ocwen APA:** Ocwen Loan Servicing, LLC Asset Purchase Agreement (as attached as Exhibit 1 to Amended Notice of Successful Bidders at the Auctions and Sales of (A) The Platform Assets to Ocwen Loan Servicing, LLC and (B) The Whole Loan Assets to Berkshire Hathaway Inc. and Notice of Filing (A) Ocwen APA and (B) Amended and Restated BH Legacy APA) [Docket No. 2050]
- d. **Berkshire Hathaway Sale Order:** Order Under 11 U.S.C. §§ 105, 363 and 365 and Fed. R. Bankr. P. 2002, 6004, 6006 and 9014 (I) Approving (A) Sale of Debtors' Assets Pursuant to Asset Purchase Agreement with Berkshire Hathaway, Inc.; (B) Sale of Purchased Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests; and (C) Related Agreements; and (II) Granting Related Relief [Docket No. 2247]
- e. **Berkshire Hathaway APA:** Berkshire Hathaway Inc. Amended and Restated Asset Purchase Agreement (as attached as Exhibit 4 to Amended Notice of Successful Bidders at the Auctions and Sales of (A) The Platform Assets to Ocwen Loan Servicing, LLC and (B) The Whole Loan Assets to Berkshire Hathaway Inc. and Notice of Filing (A) Ocwen APA and (B) Amended and Restated BH Legacy APA) [Docket No. 2050]

**Adjourned Cure Objections:**

- a. Objection of DB Structured Products, Inc. and MortgageIT Holdings, Inc. to Debtors' Proposed Cure Amount and to Assumption and Assignment of Related Agreements [Docket No. 1623]

- (i) Supplemental Objection of DB Structured Products, Inc. and MortgageIt Holdings, Inc. to Debtors' Proposed Cure Amount and to Assumption and Assignment of Related Agreements [Docket No. 2037]

**Status:** The hearing on this matter has been adjourned to March 21, 2013.

**b.** Limited Objection of Financial Guaranty Insurance Company to the Debtors' Sale Motion and Assumption Notice Docket No. 1746]

- (i) Declaration of Lori Sinanyan in Support of the Limited Objection of Financial Guaranty Insurance Company to the Debtors' Sale Motion and Assumption Notice [Docket No 1748]

**Status:** The hearing on this matter has been adjourned to March 21, 2013.

**c.** Statement and Reservation of Rights of Ambac Assurance Corporation and the Segregated Account of Ambac Assurance Corporation with Respect to Debtors' Motion for Order (I) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (II) Authorizing and Approving Asset Purchase Agreements Thereto; (III) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto; and (IV) Granting Related Relief [Docket No. 2015]

- (i) Objection and Reservation of Rights of Ambac Assurance Corporation and the Segregated Account of Ambac Assurance Corporation to Proposed Assumption and Assignment of Certain Executory Contracts [Docket No. 1810]
- (ii) Letter from David W. Dykhous, counsel to Ambac Assurance Corporation and the Segregated Account of Ambac Assurance Corporation, to Judge Martin Glenn, dated January 28, 2013 [Docket No. 2728]
- (iii) Notice of Presentment of Stipulation and Order Regarding the Sale Objection of Ambac Assurance Corporation and the Segregated Account of Ambac Assurance Corporation [Docket No. 2940]
- (iv) Stipulation and Order Regarding Sale Objection of Ambac Assurance Corporation and the Segregated Account of Ambac Assurance Corporation [Docket No. 2993]

**Status:** The hearing on the Ambac Objection as it pertains to servicing-related rights will be held on March 28, 2013. The hearing on Ambac's cure objection, to the extent necessary, is to be scheduled on a date to be determined per the parties' Stipulation and Order [Docket No. 2993].

**Replies:**

- a. Debtors' Omnibus Reply to Objections to Debtors' Sale Motion [Docket No. 2135]
- b. Debtors' Omnibus Reply to Objections to the (A) Assumption and Assignment of Certain Agreements and (B) Related Cure Amounts [Docket No. 2574]

**V. PLAN STATUS UPDATE**

- 1. The Debtors will provide the Court with a status update on plan negotiations.

**VI. CONTESTED MATTERS**

- 1. Debtors' Motion for Entry of an Order Under Bankruptcy Code Section 363 and Bankruptcy Rule 6004 (I) Authorizing the Debtors to Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services in Furtherance of the Debtors' Compliance Obligations Under Federal Reserve Board Consent Order and (II) Reaffirming Relief Granting in the GA Servicing Order [Docket No. 1357]

**Related Documents:**

- a. Notice of Filing Supplemental Exhibits to Debtors' Motion for Entry of an Order Under Bankruptcy Code Section 363 and Bankruptcy Rule 6004 (I) Authorizing the Debtors to Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services in Furtherance of the Debtors' Compliance Obligations Under Federal Reserve Board Consent Order and (II) Reaffirming Relief Granting in the GA Servicing Order [Docket No. 1527]
- b. Notice of Adjournment of Hearing [Docket No. 1556]
- c. Interim Order Under Bankruptcy Code Section 363 and Bankruptcy Rule 6004 (I) Authorizing the Debtors to Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services in Furtherance of the Debtors' Compliance Under Federal Reserve Board Consent Order and (II) Reaffirming Relief Granted in the GA Servicing Order [Docket No. 1799]
- d. Second Interim Order Under Bankruptcy Code Section 363 and Bankruptcy Rule 6004 (I) Authorizing the Debtors to Compensate PricewaterhouseCoopers LLP, for Foreclosure Review Services in Furtherance of the Debtors' Compliance Obligations Under Federal

Reserve Board Consent Order and (II) Reaffirming Relief Granted in the  
GA Servicing Order [Docket No. 2622]

**Responses:**

- a. Limited Objection of Wilmington Trust, National Association to Debtors' Motion for Entry of an Order (I) Authorizing Debtors to Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services and (II) Reaffirming Relief Granted in the GA Servicing Order [Docket No. 1465]
- b. Omnibus Objection of the Official Committee of Unsecured Creditors to (A) The Debtors' Motion for Entry of an Order Under Bankruptcy Code Section 363 and Bankruptcy Rule 6004 (I) Authorizing the Debtors to Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services in Furtherance of the Debtors' Compliance Obligations Under Federal Reserve Board Consent Order and (II) Reaffirming Relief Granted in the GA Servicing Order, (B) Pepper Hamilton Retention Application, and (C) Hudson Cook Retention Application [Docket No. 1493]
- c. Ally Financial Inc.'s (A) Position Statement Regarding the Debtors' (I) PricewaterhouseCoopers Motion and (II) Pepper Hamilton and Hudson Cook Retention Applications and (B) Status Report Regarding the Committee's Related Discovery Requests [Docket No. 1573]
- d. Supplemental Objection of the Official Committee of Unsecured Creditors to (A) the Debtors' Motion for Entry of an Order Under Bankruptcy Code Section 363 and Bankruptcy Rule 6004 (I) Authorizing the Debtors to Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services in Furtherance of the Debtors' Compliance Obligations Under Federal Reserve Board Consent Order and (II) Reaffirming Relief Granted in the GA Servicing Order, (B) Pepper Hamilton Retention Application, and (C) Hudson Cook Retention Application [Docket No. 1725]

**Replies:**

- a. Debtors' Statement in Further Support of (A) Debtors' Motion for an Order (I) To Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services and (II) Reaffirming Relief Granting in the GA Servicing Order (B) Debtors' Application to Employ and Retain Hudson Cook, LLP as Special Counsel, and (C) Debtors' Application to Employ and Retain Pepper Hamilton LLP as Special Foreclosure Review Counsel for Bankruptcy Issues [Docket No. 1749]

**Status:** The hearing on this matter will be going forward.

- 2. Debtors' Application for an Order Under Section 327(e) of the Bankruptcy Code, Bankruptcy Rule 2014(a) and Local Rule 2014-1 Authorizing the Debtors to Employ

and Retain Pepper Hamilton LLP as Special Foreclosure Review Counsel for Bankruptcy Issues to the Debtors, *Nunc Pro Tunc* to May 14, 2012 [Docket No. 1426]

**Related Documents:**

- a. Notice of Adjournment of Hearing [Docket No. 1556]
- b. Interim Order Authorizing the Retention and Employment of Pepper Hamilton LLP as Special Foreclosure Review Counsel for Bankruptcy Issues to the Debtors, *Nunc Pro Tunc* to the Petition Date [Docket No. 1797]
- c. Second Interim Order Authorizing the Retention and Employment of Pepper Hamilton LLP as Special Foreclosure Review Counsel for Bankruptcy Issues to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 2621]

**Responses:**

- a. Omnibus Objection of the Official Committee of Unsecured Creditors to (A) The Debtors' Motion for Entry of an Order Under Bankruptcy Code Section 363 and Bankruptcy Rule 6004 (I) Authorizing the Debtors to Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services in Furtherance of the Debtors' Compliance Obligations Under Federal Reserve Board Consent Order and (II) Reaffirming Relief Granted in the GA Servicing Order, (B) Pepper Hamilton Retention Application, and (C) Hudson Cook Retention Application [Docket No. 1493]
- b. Ally Financial Inc.'s (A) Position Statement Regarding the Debtors' (I) PricewaterhouseCoopers Motion and (II) Pepper Hamilton and Hudson Cook Retention Applications and (B) Status Report Regarding the Committee's Related Discovery Requests [Docket No. 1573]
- c. Supplemental Objection of the Official Committee of Unsecured Creditors to (A) the Debtors' Motion for Entry of an Order Under Bankruptcy Code Section 363 and Bankruptcy Rule 6004 (I) Authorizing the Debtors to Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services in Furtherance of the Debtors' Compliance Obligations Under Federal Reserve Board Consent Order and (II) Reaffirming Relief Granted in the GA Servicing Order, (B) Pepper Hamilton Retention Application, and (C) Hudson Cook Retention Application [Docket No. 1725]

**Replies:**

- a. Debtors' Statement in Further Support of (A) Debtors' Motion for an Order (I) To Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services and (II) Reaffirming Relief Granting in the GA Servicing Order (B) Debtors' Application to Employ and Retain Hudson Cook, LLP as

Special Counsel, and (C) Debtors' Application to Employ and Retain Pepper Hamilton LLP as Special Foreclosure Review Counsel for Bankruptcy Issues [Docket No. 1749]

**Status:** The hearing on this matter will be going forward.

3. Debtors' Application Under Section 327(e) of the Bankruptcy Code, Bankruptcy Rule 2014(a) and Local Rule 2014-1 for Authorization to Employ and Retain Hudson Cook, LLP as Special Counsel to the Debtors, *Nunc Pro Tunc* to May 14, 2012 [Docket No. 1427]

**Related Documents:**

- a. Notice of Adjournment of Hearing [Docket No. 1556]
- b. Interim Order Authorizing the Retention and Employment of Hudson Cook, LLP as Special Counsel to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 1798]
- c. Second Interim Order Authorizing the Retention and Employment of Hudson Cook, LLP as Special Counsel to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 2620]

**Responses:**

- a. Omnibus Objection of the Official Committee of Unsecured Creditors to (A) The Debtors' Motion for Entry of an Order Under Bankruptcy Code Section 363 and Bankruptcy Rule 6004 (I) Authorizing the Debtors to Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services in Furtherance of the Debtors' Compliance Obligations Under Federal Reserve Board Consent Order and (II) Reaffirming Relief Granted in the GA Servicing Order, (B) Pepper Hamilton Retention Application, and (C) Hudson Cook Retention Application [Docket No. 1493]
- b. Ally Financial Inc.'s (A) Position Statement Regarding the Debtors' (I) PricewaterhouseCoopers Motion and (II) Pepper Hamilton and Hudson Cook Retention Applications and (B) Status Report Regarding the Committee's Related Discovery Requests [Docket No. 1573]
- c. Supplemental Objection of the Official Committee of Unsecured Creditors to (A) the Debtors' Motion for Entry of an Order Under Bankruptcy Code Section 363 and Bankruptcy Rule 6004 (I) Authorizing the Debtors to Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services in Furtherance of the Debtors' Compliance Obligations Under Federal Reserve Board Consent Order and (II) Reaffirming Relief Granted in the GA Servicing Order, (B) Pepper Hamilton Retention Application, and (C) Hudson Cook Retention Application [Docket No. 1725]



**Replies:**

- a. Debtors' Statement in Further Support of (A) Debtors' Motion for an Order (I) To Compensate PricewaterhouseCoopers, LLP for Foreclosure Review Services and (II) Reaffirming Relief Granting in the GA Servicing Order (B) Debtors' Application to Employ and Retain Hudson Cook, LLP as Special Counsel, and (C) Debtors' Application to Employ and Retain Pepper Hamilton LLP as Special Foreclosure Review Counsel for Bankruptcy Issues [Docket No. 1749]

**Status:** The hearing on this matter will be going forward.

**VII. ADVERSARY PROCEEDING MATTERS**

**Dixon v. GMAC Mortgage Corporation (Adv. Proc. No. 12-02088)**

1. Pre-trial Conference in Adversary Proceeding

**Related Documents:**

- a. Complaint [Docket No. 1]
- b. Application to Proceed in District Court Without Prepaying Fees or Costs [Docket No. 2]
- c. Summons with Notice of Pre-Trial Conference [Docket No. 3]
- d. Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b), FRCP 12(b)(6) and FRCP 9(b) [Docket No. 4]

**Status:** The pre-trial conference on this matter will be going forward.

**DeMustchine v. RAHI Real Estate Holdings, LLC (Adv. Proc. No. 12-02065)**

1. Pre-trial Conference in Adversary Proceeding

**Related Documents:**

- a. Complaint [Docket No. 1]
- b. Summons with Notice of Pre-Trial Conference [Docket No. 3]
- c. Notice of Adjournment of Pre-Trial Hearing to February 28, 2013 at 2:00 p.m. [Docket No. 4]
- d. Defendant's Answer to Plaintiff's Complaint [Docket No. 6]

**Status:** The pre-trial conference on this matter will be going forward.

Dated: February 28, 2013  
New York, New York

/s/ Gary S. Lee  
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